

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND

IN RE:

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DENISE E. SAMPLE

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### Debtors

CASE NO. 09-33132  
Chapter 7

Movant

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VS

\*

UNIFUND CCR PARTNERS LLC \*

### Respondent

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MOTION TO AVOID JUDICIAL LIEN  
IMPAIRING DEBTOR'S EXEMPTION

DENISE E. SAMPLE, by Arthur L. Rhoads, Jr., her attorney, hereby files this Motion to Avoid a Judicial Lien Impairing Debtor's Exemptions under 11 U.S.C. Section 522 and for reasons state:

1. The movant, Denise E. Sample, is the debtor in the above entitled case under Chapter 7 of the Bankruptcy Code pending in this Court.

2. That Respondent, UNIFUND CCR PARTNERS LLC has a Judicial  
lien with an approximate balance in the sum of \$9000.00 on the  
following described real property of the Debtor, namely, **1814 W.  
Franklin Street, Baltimore City, Maryland**

3. Such lien resulted from a judgment obtained in the District Court of Maryland for Baltimore City in case No. 0019894-2008.

4. Said property is of a kind described in 11 USC Sec 522 on which the debtor is entitled to have the lien of respondent avoided pursuant to said section of the Code to the extent that it impairs the exemption debtor took on Amended Schedule C in the sum of

\$3360.00.

WHEREFORE, Debtor prays for relief as follows:

1. That the lien/security interest described above be avoided in the sum of \$3360.00; and
2. For such other and further relief as the nature of her cause may require.

/s/ ARTHUR L. RHOADS, JR.

ARTHUR L. RHOADS, JR.  
704 Frederick Road  
Baltimore, MD 21228  
phone 410 788 5700  
Attorney for Debtor  
Federal Bar No. 08654

DATED: 03/11/10

I HEREBY CERTIFY that on this 11<sup>th</sup> day of March, 2010 I mailed by first class mail, postage prepaid, a copy of the foregoing motion and order to:

Monique D. Almy, Trustee  
Crowell & Moring  
1001 Pennsylvania Avenue NW 10<sup>th</sup> FL  
Washington DC 20004-2595

Office of the U. S. Trustee  
101 W. Lombard St. Ste 2650  
Baltimore, MD 21201

Unifund CCR Partners LLC  
10625 Techwood Cr  
Cincinnati OH 45242-2846

Scott T. Whiteman, Esq.  
Peroutka & Peroutka  
8028 Ritchie Hwy, Ste 300  
Pasadena MD 21122  
Attorney for Creditor

Denise E. Sample  
1814 W. Franklin Street  
Baltimore MD 21223

/s/ ARTHUR L. RHOADS, JR. \_\_\_\_\_

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